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15 Attorneys for Plaintiff United States of America

16 UNITED STATES DISTRICT COURT

17 EASTERN DISTRICT OF CALIFORNIA

18 United States of America,

19 Plaintiff,

20 v.

21 CB SURETY, LLC, et al.,

22 Defendants.

23 Civil Case No. 2:23-cv-02812-TLN-DB

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27 AFFIDAVIT OF ANDREW K.  
CRAWFORD IN SUPPORT OF  
PLAINTIFF'S REQUEST FOR ENTRY OF  
DEFAULT BY THE CLERK AGAINST  
DEFENDANTS BRYAN BASS AND BASS  
BUSINESS CONSULTANTS

1 I, Andrew K. Crawford, hereby declare:

2       1. I am a Trial Attorney with the U.S. Department of Justice's Civil Division,  
3 Consumer Protection Branch, and I am a counsel in this matter for Plaintiff the United States of  
4 America. Unless indicated otherwise, I have personal knowledge of the facts stated herein, and if  
5 called as a witness, would competently testify thereto.

6       2. This affidavit is offered in support of Plaintiff's Request for Entry of Default by  
7 the Clerk against Defendants Bryan Bass and Bass Business Consultants.

8       3. On December 1, 2023, the United States filed its Complaint (ECF No. 1).  
9 Pursuant to Rule 4(d) of the Federal Rules of Civil Procedure, on January 26, 2024, the United  
10 States sent a request to waive service to Defendant Bryan Bass, individually, and in his capacity  
11 as a director of Defendant Bass Business Consultants. On January 31, 2024, Defendant Bryan  
12 Bass signed the waiver of service of behalf of himself (ECF No. 73) and on behalf of Defendant  
13 Bass Business Consultants (ECF No. 74).

14       4. It is my understanding that Defendants Bryan Bass and Bass Business Consultants  
15 are outside any judicial district of the United States.

16       5. Pursuant to Rule 12(a)(1)(A)(ii) of the Federal Rules of Civil Procedure,  
17 Defendants Bryan Bass and Bass Business Consultants had 90 days to answer or otherwise  
18 respond to the Complaint. Therefore, an answer or response to the Complaint was due on or  
19 before April 25, 2024.

20       6. As of the date of this Affidavit, the United States has not received an answer from  
21 any of the above-listed Defendants, nor is there record of an answer or response entered on the  
22 Court's electronic docket.

23       7. Pursuant to 28 U.S.C. § 1746, I hereby declare under penalty of perjury that the  
24 foregoing is true and correct to the best of my knowledge and belief.

1 Executed on May 10, 2024, in Washington, DC.  
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ANDREW K. CRAWFORD  
Trial Attorney  
Consumer Protection Branch  
United States Department of Justice  
Attorney for Plaintiff United States

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